

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

LESLIE PURYEAR, *on behalf of himself and  
all those similarly situated,*

Plaintiff,

v.

CHADWICK DOTSON, *in his individual  
capacity,*

HAROLD CLARKE, *in his individual  
capacity,*

Defendants.

Civil Action No. 3:24-cv-00479-REP

**JOINT MOTION TO ENTER STIPULATED PROTECTIVE ORDER**

Plaintiff Leslie Puryear and Defendants Chadwick Dotson and Harold Clarke (collectively, the “Parties”) jointly move the Court under Federal Rule of Civil Procedure 26(c) for entry of the attached Protective Order. The Parties have conferred and believe that this litigation may involve the disclosure of materials that contain confidential information that should be protected from public disclosure, including medical records and non-public criminal history information. The parties agree that the improper disclosure of this material could result in “annoyance, embarrassment, oppression, or undue burden or expense.” Fed. R. Civ. P. 26(c). The Parties believe that the attached Protective Order will both minimize discovery disputes related to confidentiality and adequately protect the confidentiality interests of the Parties and third parties.

Dated: September 26, 2024

Respectfully submitted,

/s/ Michael Allen

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**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of Joint Motion to Enter Stipulated Protective Order was filed on September 26, 2024 through the Court's electronic filing system.

/s/ Michael Allen

Michael Allen

*Attorney for Plaintiff*